

EXHIBIT 18

From: Michael Bloch
Sent: Thursday, August 22, 2019 12:04 AM
To: 'Edward ReBrook, ESQ' <rebrooklaw@gmail.com>
Subject: Sines v. Kessler

Mr. ReBrook,

As we noted May 13, there remain a number of outstanding discovery items for your clients.

With respect to Mr. Schoep, the following items remain outstanding:

- Credentials for the email address nsm88media2@protonmail.com;
- Credentials to access the non-public content of the following websites: nsm88.org, NSMradio.org; nsmmedia.org, nsm88records.com.

With respect to NSM and NF, it remains the case that you have only produced items to the vendor in the possession of Jeff Schoep. As we have noted, we believe there are others within those organizations who possess responsive documents, including, for example, Brian Culpepper, who was a spokesman for NSM at the time of Unite the Right, and Burt Colucci, who, according to recent deposition testimony, apparently set up and controlled an e-mail system for NSM that contained relevant documents. It is our position that you have not fulfilled your obligation to conduct a reasonable investigation of the entities you represent to respond fully to our discovery requests. Please let us know by Wednesday, August 28, whether you intend to produce documents on behalf of NSM or NF for custodians other than Jeff Schoep. If we do not hear from you on this issue prior to Wednesday, August 28, we will presume you do not intend to make any inquiry regarding additional custodians for NF or NSM and we will raise these issues with the Court.

We ask that Defendant Schoep send the third-party vendor the outstanding credentials to the above-listed accounts and that NSM and NF provide supplemental certifications with electronic devices and accounts for additional custodians by August 28.

Additionally, if there are more accounts and devices of which Plaintiffs are unaware that contain potentially responsive documents, Defendants are obligated to identify and produce those account credentials and devices. Thanks.

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